

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
WESTERN DIVISION**

JACK D. McCULLOUGH,

Plaintiff,

v.

THE CITY OF SYCAMORE, SYCAMORE
PD OFFICER DANIEL HOFFMAN and
SYCAMORE PD OFFICER TIFFANY
ZIEGLER, et.al.

Defendants.

Court No. 17-cv-50116

Honorable Frederick J. Kapala
Magistrate Judge Iain D. Johnston

AGREED MOTION
FOR EXTENSION OF TIME TO ANSWER OR OTHERWISE PLEAD TO
PLAINTIFF'S COMPLAINT

NOW COMES Defendant's, SYCAMORE PD OFFICER DANIEL HOFFMAN, by and through his attorneys, PETERSON, JOHNSON & MURRAY - CHICAGO, LLC, and move this Honorable Court for their Agreed Motion for Extension of Time to Answer or Otherwise Plead to August 21, 2017, states as follows:

1. Plaintiff, JACK D. McCULLOUGH filed a Complaint on April 14, 2017.
2. The undersigned counsel was recently retained on May 11, 2017 to represent and defend Officer Ziegler and the City of Sycamore, as Officer Hoffman had not yet been served.
3. Retired Officer Daniel Hoffman is currently performing missionary work in Africa and was just recently located in South Africa and served on July 22, 2017. The undersigned is working with retired Officer Daniel Hoffman in order to prepare a responsive pleading.
4. The undersigned consulted with counsel for Plaintiff, and they indicated that they do not oppose this motion.
5. The extension of time requested through this motion will prejudice no party and it is not intended for any improper purpose, such as to needlessly compound the expense of litigation or otherwise inconvenience the Court, parties or counsel.

WHEREFORE, for the above and foregoing reasons, Defendant respectfully request that this Honorable Court enter and Order granting them an extension of time until August 18, 2017 in within which time to file pleadings on behalf of Officer Hoffman responsive to Plaintiff's Complaint.

Respectfully submitted,

By: /s/ Dominick L. Lanzito
One of the Attorneys for Defendants

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